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Related statutes or regulations	Competition and Markets Authority Regulatory Framework for Higher Education in England (OfS) Office of the Independent Adjudicator for Higher Education Data Protection Act 2018
Related policies/procedures/guidance/forms	Code of Conducts Code of Ethics Research Ethics Policy Procurement Policy Whistleblowing Policy Anti-Bribery Policy Staff Student Relationship Policy Staff Recruitment and Selection Policy Admissions Policy
Staff member responsible for update	Katie Jack

Amendment History

Version	Revision Summary	Date Approved	Author
2022.1	No changes were made to this policy	26/06/2026	Policy Working Group

Conflict of Interest Policy

1. Introduction

1.1 This Policy applies to the board and management of Christ the Redeemer College (CRC) and to the members of all the respective committees and sub-committees. This Policy includes a Register of Interests and a declaration of interests form ("the Form") covering the board and management of CRC.

2. Purpose

2.1 Board members as directors of CRC have a legal obligation under the Companies Acts to act in the best interests of the College and in accordance with the College's Memorandum and Articles of Association. Members of management and members of any sub committees are required by the board to comply with this Policy.

2.2 Conflicts of interest may arise where the personal, professional, institutional or family interests or loyalties of members of the board or management conflict with those of CRC. Such conflicts can inhibit free discussion, result in decisions or actions that are not in the best interests of CRC, or risk giving the impression that CRC has acted improperly.

2.3 The aim of this Policy is to protect Christ the Redeemer College and the board and management from any appearance of impropriety.

3. Declaration of Interests for Recording on the Register of Interests urpose

3.1 Affected parties shall declare their interests, and any gifts or hospitality received in connection with their role in Christ the Redeemer College. A Form is provided for declaration of interests. Declarations of gifts should be made in writing to the Christ the Redeemer College's Company Secretary. The Form will require to be completed and updated annually, and also when any changes occur. Forms together with any declaration of gifts shall be made or delivered (as the case may be) to the Company Secretary of Christ the Redeemer College except where the Company Secretary wishes to declare gifts in which case the declaration shall be made to a Centre manager of Christ the Redeemer College. If you are unsure as to what to declare, or if your declaration requires to be updated, then please contact the Company Secretary for guidance.

3.2 Interests will be recorded in the Register. The Register will be maintained and retained by the Company Secretary of Christ the Redeemer College and be accessible to members of the general public, staff of Christ the Redeemer College, and Academic Partners and Associated Institutions of Christ the Redeemer College as defined in the Articles of Association of Christ the Redeemer College.

4. Data Protection

4.1 Personal information provided by board members or members of the management will be processed in accordance with data protection principles as set out in the Data Protection Act 2018 as well as the GDPR guidelines and Christ the Redeemer College shall make notification to the Information Commissioner as may be required. Personal data will be processed to ensure that board members and members of the management group act in the best interests of Christ the Redeemer College and in accordance with Christ the Redeemer College's Memorandum and Articles of Association. The information provided will not be used for any other purpose.

5. A Conflict of Interests

Declaration of Interests

5.1 If a conflict of interest arises at a meeting of the board or management group the board member or member of the management group who has a conflict of interest shall be obliged to declare his/her interest.

5.2 A board member or management group member should not be involved in any decision relating to a matter in which he or she has a material interest except with the permission of other members of the committee in which the matter arises.

5.3 If a board member or member of the management group fails to declare an interest which is known to any other member of the board or management group, then that other person may declare that interest.

6. Decisions taken where a board member or member of the management group has an interest

6.1 A board member or a member of the management group shall not vote at any meeting of the board or management group on any resolution concerning any matter in which he or she has directly or indirectly an interest or duty which is material and which conflicts or may conflict with the interests of Christ the Redeemer College.

6.2 The chair of any meeting of the board or management group shall temporarily resign the chair for consideration of any resolution concerning any matter in which he or she has directly or indirectly an interest or duty which is material and which conflicts or may conflict with the interests of Christ the Redeemer College and another of those persons present shall be appointed by simple majority to take the chair for consideration of that resolution.

6.3 Provided he/she has disclosed the nature and extent of any material interest, if the board or management permits, a board member or a member of the management group may vote in regard to any contract, arrangement or other matter on which he or she is interested and subject to such permission, such vote shall be counted and he or she shall also be counted in determining whether a quorum is present for consideration of any such contract, arrangement or other matter.

6.4 All decisions under a conflict of interest will be recorded by the Secretary and reported in the Minutes of the Meeting. The report will record:

- The nature and extent of the conflict.
- The outline of the discussion.
- The actions taken to manage the conflict.
- Whether the person concerned was permitted to participate in consideration and vote on the matter in respect of which the conflict arose.

6.5 Where a board member benefits from the decision, this will be reported in the annual report and accounts in accordance with SORP 2000.

6.8 An exception applies to contracts of less than £1,000 in value. Random checks against the Register of Interests will be made on the award of contracts or other arrangements below this value. If the cumulative value of a series of small contracts or arrangements exceeds £10,000, the board members will operate the policy used for individual contracts over that sum. The exception does not apply to contracts of employment with the Company.

7. Managing Contracts

7.1 If a board member or a member of the management group has a conflict of interest, he or she must not be involved in managing or monitoring a contract in which he or she has an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices and termination of the contract if the relationship is unsatisfactory.